

## **Administrative Procedure**

# **CPCC-PRO-EM-40360**

PRC-PRO-EM-40360

## **Building Emergency Plans and Facility Response Plans**

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- 100 K Facility :  
**Categorical Exclusion:** GCX-2 (Editorial Changes)  
**Screener:** Kraemer, Laurie
- 324 Facility :  
**Categorical Exclusion:** GCX-2 (Editorial Changes)  
**Screener:** Kraemer, Laurie
- Canister Storage Building/Interim Storage Area :  
**Categorical Exclusion:** GCX-2 (Editorial Changes)  
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- Plutonium Finishing Plant :  
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- Solid Waste Operations Complex :  
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## Change Summary

### Description of Change

Editorial change consists of updating company terminology (CHPRC to CPCCo) and referenced documents (PRC to CPCC), as well as an update to the current procedure templates, including spell check and updated table of contents.

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### 1.0 INTRODUCTION

#### 1.1 Purpose

This procedure contains responsibilities and templates for preparing, updating, and issuing Central Plateau Cleanup Company (CPCCo) facility-specific building emergency plans (BEP) and facility response plans (FRP).

#### 1.2 Scope

This procedure addresses the development of emergency plans for CPCCo facilities to comply with various drivers, which may include one or more of the following: contingency plan requirements of WAC 173-303-201, -350, and -360, Hazardous Waste Operations (HAZWOPER) requirements of 29 CFR 1910.120, and/or DOE/RL-94-02, *Hanford Emergency Management Plan*.

The requirements for BEP and FRP are delineated in DOE/RL-94-02, Sections 1.2, 2.2.1.1.3, the *Resource Conservation and Recovery Act* (RCRA) contingency plan requirements of WAC 173-303-201, -350, and -360, and HAZWOPER requirements of 29 CFR 1910.120, *Hazardous Waste Operations and Emergency Response*, as referenced by the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) requirements of 40 CFR 300.150.

HAZWOPER requirements in 29 CFR 1910.120 allow for facilities to choose between an emergency response plan (29 CFR 1910.120(l) and (p)) or an emergency action plan (29 CFR 1910.38(a)). The BEP template meets both sets of requirements. The FRP template meets the requirements for emergency action plans.

#### 1.3 Applicability

This procedure is applicable to all CPCCo projects and is administered by the CPCCo Emergency Preparedness (EP) Program.

#### 1.4 Implementation

This procedure is effective upon publication.

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**2.0 RESPONSIBILITIES****2.1 Facility Manager**

- Overall responsibility for the development, approval, and implementation of the BEP or FRP.

**2.2 Emergency Preparedness Coordinator**

- Facilitates development, reviews, updates, and approvals of the BEP or FRP.

**2.3 Emergency Preparedness Manager**

- Ensures qualified EP Coordinators are assigned to projects requiring BEPs or FRPs.
- Responsible for ensuring that all CPCCo BEPs and FRPs are compliant with contingency plan requirements of WAC 173-303-201, -350, and -360, HAZWOPER requirements of 29 CFR 1910.120, and/or DOE/RL-94-02, and DOE O 151.1C, *Comprehensive Emergency Management System*.
- Responsible for maintaining annual review documentation submitted by Emergency Preparedness Coordinators.

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### 3.0 PROCESS

#### 3.1 Requirements for New BEP or FRP

**NOTE:** *The BEP is for regulatory compliance purposes. Therefore, it may be necessary to develop a new BEP prior to the Hazards Survey/EPHA process. Coordinate with CPCCo Environmental Protection as necessary.*

##### 3.1.1 New BEP Determination

- Hazardous facilities are defined as facilities that contain hazardous materials capable of generating an Alert, Site Area Emergency, or General Emergency and require establishment of a Hazardous Materials Operational Emergency Program. A new BEP is required for any hazardous facility identified as the result of the Hazards Survey/Emergency Planning Hazards Assessment (EPHA) process.

##### 3.1.2 New FRP Determination

- NOTE:**
- *It is permissible for projects to issue a BEP in lieu of an FRP for low hazards facilities, non-occupied hazardous facilities, or non-occupied units.*
  - *It is permissible for projects with CERCLA units/activities subject to 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response or 29 CFR 1910.38, Emergency Action Plans, requirements to incorporate BEP or FRP template information into a Site-Specific Health and Safety Plan (SSHASP) if all the information from the template is incorporated in the SSHASP in the identical format called for in the template.*
  - *Projects with activities subject to Spill Prevention, Control and Countermeasure Plans (SPCC) requirements through either the Clean Water Act (40 CFR 112) or through the Toxic Substances Control Act (40 CFR 761) can prepare a separate SPCC plan in lieu of a BEP/FRP provided the SPCC plan is consistent with CPCCo Emergency Preparedness Program requirements and procedures.*
  - *Appendix A, Table 1, provides a crosswalk depicting RCRA contingency planning program requirements.*
  - Low-hazards facilities are defined as facilities that contain hazardous materials but do not require establishment of a Hazardous Material Operational Emergency Program based on a hazards survey. These facilities are typically subject to requirements driving preparation of an environmental, safety, and health related emergency preparedness plan/procedure, which includes, but is not limited to, requirements from RCRA, CERCLA, the *Toxic Substances Control Act*, and the *Occupational Safety and Health Administration (OSHA)*. If these or other regulatory requirements apply to the facility, and include a requirement for development of an emergency plan, then the facility is considered a low-hazards facility and an FRP is required (except as described in the next bullet).
  - If the emergency planning requirements can be satisfactorily met by implementation of a Facility Emergency Response Information Board (FERIB) (based on a comparison of the regulatory criteria against the information contained on the FERIB), then development of an FRP is not required. FERIBs are described in more detail in CPCC-PRO-EM-7647, *Emergency Preparedness Program Requirements*.

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### 3.2 Develop BEP or FRP

Actionee	Step	Action
Emergency Preparedness (EP) Coordinator	<b>NOTE:</b>	<ul style="list-style-type: none"> <li>• <i>Deviations from the BEP/FRP template are allowed if required to comply with specific permit agreements or when governed by CERCLA requirements only.</i></li> <li>• <i>BEPs prepared for facilities that do not meet the definition of a Hazardous Facility may substitute the title "Building Warden" for "Building Emergency Director" where appropriate within the document.</i></li> </ul>
	1.	PREPARE BEP or FRP document in accordance with the <i>Building Emergency Plan Template</i> (Site Form A-6005-786) or <i>Facility Response Plan Template</i> (Site Form A-6005-787) and the instructions in Appendixes B and C, respectively, ensuring conformance with the boilerplate language described therein.
	2.	<u>IF</u> the BEP/FRP is included in the Hanford Site Permit governing WAC 173-303 activities, <u>THEN</u> COORDINATE with CPCCo Environmental Protection according to CPCC-PRO-EP-15333, <i>Environmental Protection Processes</i> .
	3.	For a new BEP/FRP, OBTAIN document number using the Hanford Document Numbering System in accordance with CPCC-PRO-IRM-8310, <i>Document Control Processes</i> .
	4.	SUBMIT the draft BEP/FRP to facility management, USQ Screener and the facility/project Environmental Compliance Officer for review, comment, and approval. The EP Manager, EP Coordinator, or delegate shall be the final signatory on the BEP/FRP, verifying format and content is consistent with this procedure.
	5.	NOTIFY training organization to allow for incorporation into facility FEHIC training.
	6.	ISSUE the BEP/FRP in accordance with Section 3.4.

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### 3.3 Revise/Update BEP/FRP

Actionee	Step	Action
EP Coordinator	1.	<p>DETERMINE need for BEP and/or FRP revision. Because BEPs and FRPs are regulatory documents, there are cases when these documents need to be revised outside of periodic reviews. The following conditions represent cases where the BEP or FRP warrants immediate revision:</p> <ul style="list-style-type: none"> <li>When notified that applicable regulations or the facility permit are revised;</li> <li>The plan fails in an emergency;</li> <li>The facility changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases or dangerous waste or dangerous waste constituents;</li> <li>Changes are identified in the way personnel respond in an emergency;</li> <li>The identified Building Emergency Director(s) (BED)/Building Warden(s) (BW) changes; or</li> <li>The list of emergency equipment changes.</li> </ul>
	2.	<p>REVIEW existing BEP/FRP in the event of any of the above conditions exist or at least annually (not to exceed 365 days from effective date of publication or last review date) to identify any required changes as applicable and document the review on <i>Building Emergency Plan/Facility Response Plan Annual Review Checklist</i> (Site Form A-6006-147).</p>
	3.	<p><u>IF</u> an update is not necessary,  <u>THEN</u> SUBMIT/PROCESS the <i>Building Emergency Plan/Facility Response Plan Annual Review Checklist</i>,  <u>AND</u> EXIT this section;  <u>OTHERWISE</u> PROCEED to step 4.</p>
<p><b>NOTE:</b></p> <ul style="list-style-type: none"> <li>If the BEP/FRP is included in the Hanford Site Permit governing WAC 173-303 activities, changes are coordinated with CPCCo Environmental Protection according to CPCC-PRO-EP-15333, Environmental Protection Processes.</li> <li>Deviations from the BEP/FRP template are allowed if required to comply with specific permit agreements or when governed by CERCLA requirements only.</li> </ul>		
	4.	<p>ENSURE draft changes to the BEP/FRP to address issues are documented in the <i>Building Emergency Plan/Facility Response Plan Annual Review Checklist</i>.</p>



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Actionee	Step	Action
EP Coordinator	5.	SUBMIT the draft BEP/FRP to facility management, Unreviewed Safety Question (USQ) Screener and the facility/project Environmental Compliance Officer (ECO) for review, comment, and approval. The Manager, EP Coordinator, or delegate shall be the final signatory on the BEP/FRP, verifying format and content is consistent with this procedure.
	6.	NOTIFY training organization of any changes that could affect facility FEHIC training.
	7.	COMPLETE any change to the BEP or FRP as a new revision to the document (page changes are not allowed).

**3.4 Issue/Release BEP/FRP**

Actionee	Step	Action
<b>NOTE:</b> <i>The Hanford Document Numbering System can be found at the following link:</i> <a href="http://msc.rl.gov/rapidweb/hdns/hdns/index.cfm?page=ObtainNumber&amp;CFID=3223611&amp;CFTOKEN=82282741&amp;jsessionid=083010f697bdec1b4352397846b123336c60">http://msc.rl.gov/rapidweb/hdns/hdns/index.cfm?page=ObtainNumber&amp;CFID=3223611&amp;CFTOKEN=82282741&amp;jsessionid=083010f697bdec1b4352397846b123336c60</a>		
EP Coordinator	1.	<u>IF</u> revising an existing BEP/FRP, <u>THEN</u> CHECK the Hanford Document Numbering System as necessary to obtain the next revision number to be used.
	2.	Using the Hanford Document Numbering System, PREPARE document coversheets.
	3.	FORWARD the BEP/FRP to a Derivative Classifier (DC) for sensitive information review/signature, as required.
	4.	<u>IF</u> BEP/FRP is determined to be "Official Use Only" based on DC review, <u>THEN</u> IDENTIFY the BEP/FRP as "Official Use Only" in accordance with the instructions in CPCC-PRO-IRM-184, <i>Information Protection and Clearance</i> .

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Actionee	Step	Action
<b>NOTE:</b> <i>The Document Control service provider will request charge code information to provide to Duplicating Services to cover the cost of hard-copy duplication required for BEP distribution if requested.</i>		
EP Coordinator	5.	Once the BEP/FRP is ready for issuance, COMPLETE the following document release forms in accordance with CPCC-PRO-IRM-9679, <i>Administration and Technical (Non-Engineering) Document Control</i> : <ul style="list-style-type: none"> <li>Information Clearance Form, Site Form A-6001-401</li> <li>Administrative Document Processing and Approval, Site Form A-6005-184</li> <li>Release Instructions(RI) Return Receipt Required, Site Form A-6001-683</li> </ul>
	6.	ENSURE copies of BEPs are distributed to Hanford Mission Integration Solutions (HMIS) Emergency Management to meet emergency operating records requirements and a record copy is provided to Central Files.
	7.	FORWARD BEP/FRP and associated document release forms to IRM Service Provider Document Control for publication.
	8.	FORWARD an electronic copy of the finalized (signed) and approved BEP/FRP to the CPCCo EP webmaster for electronic publication on the CPCCo EP webpage.
	<b>NOTE:</b> <i>The Washington State Department of Ecology recognizes the BEP/FRP and DOE/RL-94-02 as contingency plan documentation for a particular Hanford Site location. Therefore, copies of the BEP/FRP and DOE/RL-94-02 are maintained, at a minimum, in the facility initial command post and any alternate initial command posts that are maintained.</i>	
	9.	ENSURE a current copy of the BEP/FRP, along with a copy of DOE/RL-94-02, is located at the specific locations identified in Section 12.0 of the BEP, or Section 10.0 of the FRP.

**3.5 Cancel BEP/FRP**

Actionee	Step	Action
EP Coordinator	1.	OBTAIN concurrence from facility management and Environmental Compliance Officer to cancel BEP/FRP.
	2.	To cancel a BEP or FRP, SEND an email to ^Controlled Document Mgmt with a request to recall the subject document <u>AND</u> INCLUDE a brief justification for the recall.

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**4.0 FORMS***Building Emergency Plan Template, A-6005-786**Facility Response Plan Template, A-6005-787**Information Clearance Form, A-6001-401**Administrative Document Processing and Approval, A-6005-184**Release Instructions (RI) – Return Receipt Required, A-6001-683**Building Emergency Plan/Facility Response Plan Annual Review Checklist, A-6006-147***5.0 RECORD IDENTIFICATION**

All records are required to be managed in accordance with CPCC-PRO-IRM-10588, *Records Management Processes*.

**Records Capture Table**

<b>Name of Record</b>	<b>Submittal Responsibility</b>	<b>Retention Responsibility</b>
<i>Building Emergency Plan Template, A-6005-786</i>	EP Admin	IRM Service Provider
<i>Facility Response Plan Template, A-6005-787</i>	EP Admin	IRM Service Provider
<i>Information Clearance Form, A-6001-401</i>	EP Admin	IRM Service Provider
<i>Administrative Document Processing and Approval, A-6005-184</i>	EP Admin	IRM Service Provider
<i>Release Instructions(RI) – Return Receipt Required, A-6001-683</i>	EP Admin	IRM Service Provider
<i>Building Emergency Plan/Facility Response Plan Annual Review Checklist, A-6006-147</i>	EP Admin	IRM Service Provider

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**6.0 SOURCES****6.1 Requirements**

CPCC-PRO-EM-7647, *Emergency Preparedness Program Requirements*

DOE/RL-94-02, *Hanford Emergency Management Plan*

WAC 173-303-350, *Contingency Plan and Emergency Procedures*

**6.2 References**

29 CFR 1910.38(a), *Emergency Action Plans*

40 CFR 112, *Oil Pollution Prevention*

40 CFR 761, *Toxic Substances Control Act*

CPCC-PRO-EP-15333, *Environmental Protection Processes*

CPCC-PRO-IRM-184, *Information Protection and Clearance*

CPCC-PRO-IRM-8310, *Document Control Processes*

CPCC-PRO-IRM-9679, *Administration and Technical (Non-Engineering) Document Control*

CPCC-PRO-IRM-10588, *Records Management Processes*

DOE-0223 RLEP 1.1, *Hanford Incident Command System and Event Recognition and Classification*

DOE-0223 RLEP 3.4, *Emergency Termination, Reentry, and Recovery*

DOE O 151.1C, *Comprehensive Emergency Management System*

WAC 173-303-170, *Requirements For Generators Of Dangerous Waste*

WAC 173-303-200, *Conditions for exemption for a large quantity generator that accumulates dangerous waste*

WAC 173-303-400, *Interim Status Facility Standards*

WAC 173-303-600, *Final Facility Standards*

WAC 173-303-802, *Permits By Rule*

**6.3 Bases**

WAC 173-303-145, *Spills And Discharges Into The Environment*

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### Appendix A - CPCCo RCRA Contingency Planning Program

**Table 1. CPCCo RCRA Contingency Planning Program**

Emergency Preparedness Classification	RCRA Classification	Ecology's Enforceability	Documentation Required	Minimum Personnel Training	Emergency Coordinator Training (WAC 173-303-360)
Hazardous Facility (Determined by Hazards Assessment)	A. Final Status Treatment, Storage or Disposal (TSD) Units under Part B Permits (Part III)  B. Interim Status TSD units managing dangerous waste  C. Central Accumulation Area (CAA) accumulation areas  D. Central Accumulation Area (CAA) tank systems	A. Permit Condition and WAC 173-303-600  B. WAC 173-303-400  C and D. WAC 173-303-201	<u>For A, B, C and D:</u>  1. Hanford Emergency Management Plan (DOE/RL-94-02)  2. Building Emergency Plan (HNF-IP-0263-XXX)	<u>For A, B, C and D:</u>  1. Hanford General Employee Training (HGET)  2. Facility Emergency and Hazard Information Checklist (e.g. 03EXXX) or equivalent computer-based training course <sup>2</sup>	<u>For A, B, C and D:</u>  Building Emergency Director (BED) and alternates (initial and requalification 02028B, 037515)
Low Hazards Facility	A. TSD Units undergoing closure (Part V and VI) <sup>1</sup>  B. Inactive interim status TSD Units or interim status TSD units receiving non-dangerous effluents  C. Central Accumulation Area (CAA)  D. Central Accumulation Area (CAA) tank systems  E. Satellite accumulation areas <sup>3</sup>	A. Permit Condition  B. WAC 173-303-400  C, D, and E. WAC 173-303-201	<u>For A:</u> 1. Hanford Emergency Management Plan  2. Part V or Part VI Closure Plan  <u>For B, C, D, and E:</u> 1. Hanford Emergency Management Plan  2. Facility Response Plan (HNF-IP-0603-xxx)	<u>For A, B, C, D and E:</u> 1. HGET  <u>For B, C and D:</u> 1. HGET 2. Facility Emergency and Hazard Information Checklist (e.g. 03EXXX) or equivalent computer-based training course <sup>2</sup>  <u>For E:</u> 1. HGET 2. Facility Emergency and Hazard Information Checklist (03E500) or equivalent computer-based training course <sup>2,4</sup>	<u>For A, B, C, and D:</u>  Building Wardens (BW) and alternates (initial and requalification 037500, 037525)  <u>For E:</u> None
<b>Notes:</b> 1. Part III, V, and VI refer to the section of the Hanford Facility RCRA Permit. 2. Hanford Fire Department and Hanford Patrol receive equivalent training and are excluded from these requirements. 3. 03E500 is specifically designed to accommodate unit/building specific Hazard Communication, EP and Satellite Accumulation Area considerations and is used for all Unit/buildings not requiring a specific course number.					

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### Appendix B - Building Emergency Plan Template Writer Information

When issued, a BEP is used to demonstrate compliance with emergency preparedness planning requirements at hazardous facilities as defined by DOE/RL-94-02. Specifically, this Appendix discusses BEP development using Site Form A-6005-786, *Building Emergency Plan Template*.

The writers of BEPs shall use Site Form A-6005-786 as the template for preparing a BEP. Certain sections of this template are identified to help the writer determine which sections can be deleted and which sections are required. BEPs must be prepared according to the instructions contained within the template. Conformance to the format, arrangement of sections, and the language is mandatory unless specific regulatory permit agreements require otherwise. In addition, when activities are governed strictly by CERCLA requirements, specific references to the RCRA permit may be removed and the language adjusted accordingly.

This document contains instructional paragraphs that indicate the appropriate compliance information to be included in each section of a Facility BEP. Writers using this document to assist in preparing their plan should read the instructional paragraphs, gather or provide the necessary information, and delete the instructions as indicated. For example, the instructional information written in italics signifies that it is for the writer's information only, and should be deleted from their BEP before final review and approval. In addition, information that is to be included in the BEP verbatim is written in bold text. When bold text is qualified through use of notes and italicized text, the writer does not have to use the bold text verbatim based on the content of the note and italicized text.

New BEPs will use current document identification numbers as provided by the Hanford Document Numbering System and as such, will not necessarily use the HNF-IP-0263-XXX nomenclature.

BEPs prepared for facilities that do not meet the definition of a hazardous facility may substitute the title "Building Warden" for "Building Emergency Director" where appropriate within the document.

**NOTE:** *When preparing RCRA Permit documentation for a RCRA contingency plan, the writer needs to copy the text, tables, figures, etc., from the RCRA enforceable sections of the BEP as listed in Section 2.0 of A-6005-786. When copying this information, the writer can copy the entire section, or part of the section, as appropriate, to meet the RCRA Permitting needs for a particular facility. For example, if a response action or a particular piece of equipment should not be used for RCRA permitting, it can be omitted from the RCRA Permit documentation.*

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### Appendix C - Facility Response Plan Template Writer Information

When issued, a FRP is used to demonstrate compliance with emergency preparedness planning requirements at Low Hazards facilities as defined in DOE/RL-94-02. Specifically, this Appendix discusses FRP development using A-6005-787, *Facility Response Plan Template*.

The writers of FRPs shall use A-6005-787 as the template for preparing an FRP. Certain sections of this template are identified to help the writer determine which sections can be deleted and which sections are required. FRPs must be prepared according to the instructions contained within the template. Conformance to the format, arrangement of sections, and the language is mandatory unless specific regulatory permit agreements require otherwise. In addition, when activities are governed strictly by CERCLA requirements, specific references to the RCRA permit may be removed and the language adjusted accordingly.

FRPs address contingency plan planning/preparedness requirements applicable to dangerous waste management activities. Dangerous waste management activities include the following:

- Treatment-by generator activities in accordance with WAC 173-303-170(3)(b).
- 90-day accumulation activities in accordance with WAC 173-303-200(1).
- Interim status TSD unit activities in accordance with WAC 173-303-400.
- Final status TSD unit activities in accordance with WAC 173-303-600 and the Hanford Facility RCRA Permit (HF RCRA Permit; Ecology 1994 as amended).
- Permit-by-rule activities in accordance with WAC 173-303-802(5).
- Non-permitted TSD units managed according to the Tri-Party Agreement.

This document contains instructional paragraphs that indicate the appropriate compliance information to be included in each section of a Low Hazards Facility, FRP. The term Low Hazards Facility is defined in DOE/RL-94-02, Section 2.2.1.1.2, and generally includes Hanford Site facilities that are not Hazardous Facilities or General Purpose Facilities. Writers using this document to assist in preparing their plan should read the instructional paragraphs, gather or provide the necessary information, and delete the instructions in italics. Instructional information written in italics is for the writer's information only and must be deleted from the FRP before final review and approval. In addition, information that is to be included in the FRP verbatim is written in bold text. Writers of FRPs shall use this guidance document as their template for preparing the FRP.

This appendix is written to provide guidance to personnel responsible for contingency plan documentation requirements at certain Resource Conservation and Recovery Act of 1976 waste management units (RCRA units). RCRA units required to have an FRP are those classified as "Low Hazards Facilities." This classification is not a RCRA classification. A RCRA unit would be classified as a Low Hazards Facility after an EPA is performed. A Low Hazards Facility either can be a generating unit such as a 90-day accumulation area or a treatment, storage, and/or disposal (TSD) unit. Contact CPCCo Environmental Protection and/or Emergency Preparedness for any questions relating to the facility classification.



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The information published under the FRP provides the information needed to fully comply with Washington Administration Code (WAC) 173-303-350(3) elements of a contingency plan for Low Hazards Facilities. In effect, the FRP supplements DOE/RL-94-02 as the DOE/RL-94-02 document meets certain contingency plan requirements identified in Appendix A of DOE/RL-94-02. Appendix A, Table 1 discusses RCRA contingency plan requirements and identifies where contingency plan requirements are documented.

The FRP is also used to meet the requirements of 29 CFR 1910.38(a) for activities subject to the CERCLA requirements in 40 CFR 300.150.

Upon issuance of the FRP, the FRP needs to be maintained to provide an up to date response plan for events that occur at the waste management unit. Furthermore, the FRP must be provided to a regulatory agency inspector upon request. The FRP does not need to be maintained at the 90-day accumulation area or the TSD unit. The FRP is required to be maintained on the CPCCo Emergency Preparedness webpage.

Additional documents need to be maintained with the FRP to comply with RCRA contingency plan requirements:

1. DOE/RL-94-02 and
2. Response procedures.

Response procedures include sitewide response procedures and facility-specific response procedures.

The sitewide response procedures include DOE-0223 RLEP 1.1, *Hanford Incident Command System and Event Recognition and Classification* and DOE-0223 RLEP 3.4, *Emergency Termination, Reentry, and Recovery*.

Although DOE/RL-94-02 is not used to respond to events, DOE/RL-94-02 must be maintained with the FRP as DOE/RL-94-02 meets certain contingency plan requirements.